

EXHIBIT A

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

-----) Civil Action No.:
IN RE: FLINT WATER CASES) 5:16-cv-10444-JEL-MKM
) (consolidated)
)
) Hon. Judith E. Levy
-----) Mag. Mona K. Majzoub

HIGHLY CONFIDENTIAL
VIDEOTAPED DEPOSITION OF MARC EDWARDS, PH.D.

FRIDAY, AUGUST 7, 2020

Volume 1

Remote oral deposition of MARC EDWARDS, PH.D.,
conducted at the location of the witness in
Blacksburg, Virginia, commencing at approximately 9:06
a.m., on the above date, before JULIANA F. ZAJICEK, a
Registered Professional Reporter, Certified Shorthand
Reporter, Certified Realtime Reporter and Notary
Public.

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1 Did I read that correctly?

2 A. Yes.

3 Q. How did you -- how did you take this
4 response from Stephen Busch?

5 A. Just as part of a sequence of steps,
6 unfortunate steps to evade responsibility and try to
7 bullshit people, draw attention away from real
8 problems that were affecting the City of Flint.

9 MR. CAMPBELL: If you go to Exhibit 15 on my
10 list, so this is probably 32.

11 (WHEREUPON, a certain document was
12 marked Marc Edwards Deposition
13 Exhibit No. 32, for identification,
14 as of 08/07/2020.)

15 BY MR. CAMPBELL:

16 Q. This is Mel -- Miguel Del Toral's sworn
17 statement giving -- given to the Special Attorney
18 General Flood on March 23, 2016. He was asked, I
19 think it's on Page 37 or 38.

20 MR. CAVANAGH: I'm going to -- this is Charlie
21 Cavanagh. I'm going to object. If this is the
22 transcript from the special counsel, there are
23 non-attorneys on the line.

24 MR. CAMPBELL: Well, is there -- is Ms. Mays on

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1 the line?

2 MR. CAVANAGH: I show her as yes, so.

3 MR. CAMPBELL: Okay. So it is Page 37. Take it
4 down. I'll -- I'll mark it as an exhibit.

5 BY MR. CAMPBELL:

6 Q. And -- but I'm going to -- I'm going to
7 describe to you, Professor Edwards, that when Miguel
8 Del Toral was asked by the Special Attorney General
9 Flood as to whether -- as -- as to his reaction to the
10 fact that the -- that optimized corrosion control
11 treatment was unnecessary according to Busch or
12 Prysby, not needed, they didn't have to put it in
13 place, that Miguel Del Toral said his response would
14 be that that was, quote, insane, close quote.

15 Did Miguel Del Toral ever tell you that he
16 considered the MDEQ's actions with respect to avoiding
17 opt -- optimized corrosion control treatment to be
18 insane?

19 MR. CAVANAGH: Object to form. Cavanagh.

20 BY THE WITNESS:

21 A. Yes.

22 Q. Do you agree with him?

23 A. I wouldn't call it insane. I would call
24 it the actions of people who have screwed things up

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1 beyond belief and are trying to bullshit their way out
2 of it. So I guess I'd use different words, but...

3 Q. Okay. In your published --

4 MR. CAMPBELL: Alaina, can you bring up that
5 other folder now.

6 BY MR. CAMPBELL:

7 Q. And I'm going to mark as Exhibit 33
8 your -- your paper in Water Research entitled "Lead
9 release to potable water during the Flint, Michigan
10 water crisis as revealed by routine biosolids
11 monitoring data."

12 (WHEREUPON, a certain document was
13 marked Marc Edwards Deposition
14 Exhibit No. 33, for identification,
15 as of 08/07/2020.)

16 BY MR. CAMPBELL:

17 Q. Tell us -- well, first of all, do you
18 recognize that as your paper?

19 A. Yes.

20 Q. This was cutting edge stuff, was it not,
21 Dr. Edwards?

22 A. It was a different approach, yes.

23 Q. What was the purpose of this study?

24 A. Curiosity to figure out how bad things